

1 Travis A. Gagnier
2 Attorney at Law
3 33507 Ninth Avenue South, Bldg. F
4 P.O. Box 3949
5 Federal Way, WA 98063-3949
6 (253) 941-0234 Fax: 941-0476

Judge Philip H. Brandt
CHAPTER 13
Hearing Date: October 28, 2009
Hearing Time: 1:30 p.m.
Response Date: October 21, 2009

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

IN RE:

MCMANUS, Susan Lee,
Debtor.

No. 08-40644

**DEBTOR'S RESPONSE TO
TRUSTEE'S MOTION TO DISMISS
and PROOF OF SERVICE**

COMES NOW, the Debtor, by and through her attorney, Travis A. Gagnier, and responds to the Trustee's Motion to Dismiss.

The debtor has fallen behind in her plan payments. Debtor is trying to work out a loan modification with their lender(s), which would make the mortgage payments more manageable. Counsel is also working to amend her plan to remove the mortgage from the Chapter 13 Plan.

For this reason the debtor asks that the motion to dismiss be continued to December 2, 2009 to allow the debtor to modify her plan for a successful completion if able.

Respectfully submitted this 21st day of October 2009.

/s/ Travis A. Gagnier
Travis A. Gagnier, #26379
Attorney for Debtor

1
2 I declare under penalty of perjury under the laws of the State of Washington that I filed the original of the
3 foregoing with the United States Bankruptcy Court in Tacoma and served a true copy thereof to:

4 David M. Howe
Chapter 13 Trustee

Honorable Philip H. Brandt

US Trustee

5 via ECF, and to:

6 Debtor

7 via U.S. first-class mail, postage pre-paid, on the 21st day of October 2009.
8

9 /s/ Shari L. Moody

10 Shari L. Moody

11 Assistant to Travis A. Gagnier
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28